

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

KAREN SUMMERSET, individually and on
behalf of all others similarly situated,

Plaintiff,

v.

LIBERTY MUTUAL INSURANCE
COMPANY,

Defendant.

Case No. 1:25-cv-11121-PBS

CLASS ACTION

JURY TRIAL DEMANDED

PLAINTIFF'S UNOPPOSED MOTION TO AMEND

Plaintiff Karen Summerset, by and through undersigned counsel, respectfully move this Court pursuant to Federal Rule of Civil Procedure 15(a)(2) for leave to file the First Amended Class Action Complaint attached hereto as Exhibit 1. In support of this motion, Plaintiff state as follows:

Plaintiff seeks leave to file the Complaint to add claims of Sara Taylor arising from Defendant Liberty Mutual Insurance Company's alleged violations of the Telephone Consumer Protection Act ("TCPA"), 47 U.S.C. § 227, et seq. Defendant does not oppose this motion.

Federal Rule of Civil Procedure 15(a)(2) provides that courts "should freely give leave [to amend] when justice so requires." *See Foman v. Davis*, 371 U.S. 178, 182 (1962). Leave to amend should be granted unless there is evidence of undue delay, bad faith, dilatory motive, repeated failure to cure deficiencies, undue prejudice, or futility of amendment. *ACA Fin. Guar. Corp. v. Advest, Inc.*, 512 F.3d 46, 55 (1st Cir. 2008). None of these factors are present here. The proposed amendment is timely, made in good faith, and will not prejudice Defendant, particularly as Defendant has consented to the filing of the amended complaint.

For the foregoing reasons, Plaintiffs respectfully request that the Court grant this Unopposed Motion for Leave to File the First Amended Class Action Complaint and accept the attached proposed complaint.

Dated: November 11, 2025

/s/ Anthony I. Paronich
Anthony I. Paronich
Paronich Law, P.C.
350 Lincoln Street, Suite 2400
Hingham, MA 02043
(508) 221-1510
anthony@paronichlaw.com

Christopher Gold, Esq. (*admitted pro hac vice*)
Florida Bar No. 088733
GOLD LAW, PA
350 Lincoln Rd., 2nd Floor
Miami Beach, FL 33139
Tel: 305-900-4653
chris@chrisgoldlaw.com

Counsel for Plaintiff and the Proposed Class